

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MOONSCOOP SAS, et al.,)	Case 1:09-CV-01885
)	
Plaintiffs,)	JUDGE JAMES S. GWIN
)	
v.)	
)	
AMERICAN GREETINGS)	<u>MOTION OF MOONSCOOP SAS AND</u>
CORPORATION, et al.)	<u>MIKE YOUNG PRODUCTIONS, LLC TO</u>
)	<u>FILE SEPARATE MOTIONS FOR</u>
Defendants/Third Party)	<u>SUMMARY JUDGMENT</u>
Plaintiff,)	
)	
v.)	
)	
COOKIE JAR ENTERTAINMENT, INC.,)	
)	
Third-Party Defendant.)	
)	

Plaintiffs MoonScoop SAS and Mike Young Productions, LLC are prepared to file a Motion for Partial Summary Judgment with respect to their claims against Defendant American Greetings Corporation. Plaintiffs are also prepared to file a Motion for Summary Judgment seeking the dismissal of the Crossclaim filed against them by Cookie Jar Entertainment, Inc. and Cookie Jar Entertainment (USA) Inc. (the "Cookie Jar Parties"). Plaintiffs respectfully submit that the orderly presentation of these issues is best served by separately filing and briefing these motions. Accordingly, to the extent that the anticipated motions may be construed to require leave of Court pursuant to this Court's Standing Order regarding the procedures for filing motions for summary judgment, Plaintiffs respectfully request leave to separately file their Motion for Summary Judgment against American Greetings and their Motion for Summary Judgment against the Cookie Jar Parties.

Respectfully submitted,

/s/ Michael J. Garvin

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MoonScoop SAS and New Third Party

Crossclaim Defendant Mike Young

Productions, LLC

CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically this 10th day of February 2010.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.
Parties may access this filing through the Court's system.

/s/ Michael J. Garvin

*One of the Attorneys for Plaintiffs/Crossclaim
Defendants MoonScoop SAS and New Third Party
Crossclaim Defendant Mike Young Productions,
LLC*